

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

GUI GLOBAL PRODUCTS, LTD. d/b/a
GWEE,

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

§
§
§
§
§
§
§
§
§
§
§

4:20-cv-02624-AHB

**DECLARATION OF EDWARD VIEJO IN SUPPORT OF DEFENDANTS' MOTION TO
TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)**

I, Edward Viejo, declare and state as follows:

1. I am over 18 years of age and competent to make this declaration.
2. I am the Senior Director of Product Management in the North America Services Business Division at Samsung Electronics America, Inc. ("SEA") in Mountain View, California. I have been employed by SEA since 2017. If called as a witness, I could and would testify competently to the information contained herein.
3. There are four Samsung Experience Store locations in the United States, including one in Palo Alto, California.
4. SEA has no corporate offices in Houston or the Southern District of Texas.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 6, 2020 in Mountain View, California.



Edward Viejo